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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PAUL SANTIAGO,

Petitioner,

vs.

CALVIN JOHNSON, *et al.*,

Respondents.

Case No.: 2:21-cv-00896-APG-NJK

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
RESPONSE TO SECOND AMENDED
PETITION (ECF NO. 27)**

(SECOND REQUEST)

Respondents move this Court for an enlargement of time of 60 days from the current due date of November 14, 2022, up to and including January 13, 2023, in which to file their response to Paul Santiago's Second Amended Petition for a Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2254 (ECF No. 27). This Motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the second enlargement of time sought by Respondents to file the response, and the request is brought in good faith and not for the purpose of delay.

DATED: November 10, 2022.

AARON D. FORD
Attorney General

By: /s/ Trisha Chapman
Trisha Chapman (Bar No. 12716)
Deputy Attorney General

DECLARATION OF TRISHA CHAPMAN

STATE OF NEVADA)
) ss:
 COUNTY OF CLARK)

I, TRISHA CHAPMAN, being first duly sworn under oath, deposes and states as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Paul Santiago v. Calvin Johnson, et al.*, Case No. 2:21-cv-00896-APG-NJK, and as such, have personal knowledge of the matters contained herein.

2. This Motion is made in good faith and not for the purpose of delay.

3. The deadline to file a response to Santiago's Petition is November 14, 2022.

4. I have been unable with due diligence to timely complete the response herein. Our office is still in the process of redacting records pursuant to LR IC 6-1. This matter involves a minor sex assault victim, and the record is substantial, which requires more time than originally anticipated to complete this process. In addition, I am still in the process of reviewing the extensive record to determine what type of response is appropriate.

5. Since receiving the last extension, I filed responses in the following federal cases: *Polk v. William Hutchings, et al.*, 2:21-cv-00513-RFB-DJA (Response to Motion for Stay and Abeyance), *McCallister v. Brian Williams, et al.*, 2:18-cv-01140-JCM-EJY (substantive answer). I have also been working on a motion to dismiss in *Marshall v. Calvin Johnson, et al.*, 2:21-cv-02046-APG-BNW.

6. In addition, I filed responsive pleadings in the Eighth Judicial District Court in the following state habeas cases: A-22-858336-W, A-22-858412-W, A-22-858419-W, A-22-858409-W, A-22-855532-W, A-22-859385-W, A-22-859394-W, A-22-859505-W, A-22-860439-W and A-22-860347-W. I also filed a state response in the First Judicial District Court in case 22 EW 00032 1B.

7. Taking into consideration the time our office needs to finish the redactions of state record and have them reviewed as well as complete the response and have it reviewed via our internal office policies, I believe 60 days will be sufficient to complete the response to Santiago's Petition.

8. I have communicated with counsel for Santiago, and he has no objection to this request.

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1 9. For the foregoing reasons, I respectfully request an enlargement of time of 60 days, up to
2 and including January 23, 2023, in which to file a response to Santiago's Petition.

3 Executed on November 10, 2022.

4 /s/ Trisha Chapman
5 Trisha Chapman (Bar No. 12716)

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7 **IT IS SO ORDERED:**

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10 UNITED STATES DISTRICT JUDGE

11 Dated: November 14, 2022
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